

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In re:

BARFLY VENTURES, LLC, *et al.*,¹

Debtors.

Chapter 11

Hon. James W. Boyd

Jointly Administered

Case No. 20-01947-jwb

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MOTION TO APPROVE STIPULATED RELIEF

NOW COMES Innovo Development Group, L.L.C. ("Innovo"), by and through its attorneys, Wardrop & Wardrop, P.C. and for its Motion to Approve Stipulated Relief states:

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

2. On June 3, 2020, Barfly Ventures, LLC, *et al.*¹ ("Debtors") filed voluntary Petitions for relief under Chapter 11 of the U.S. Bankruptcy Code.

3. The statutory bases for the relief requested herein are §§ 362 and 544 of the Bankruptcy Code, Rules 4001 and 6007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and LBR 4001-3 and 9013.

4. The facts and circumstances supporting Innovo's Motion are set forth in the Stipulation for Relief Regarding Abandonment of Debtors' Interest in Liquor License owned by HopCat – Royal Oak, LLC, a copy of which is attached hereto as **Exhibit A** and fully incorporated herein.

5. In simple terms the Stipulation recognizes that Innovo has a first priority

¹ The Debtors are: Barfly Ventures, LLC, (8379), Barfly Management, LLC (6274) 9 Volt, LLC (d/b/a HopCat)(1129), 50 Amp Fuse, LLC (d/b/a Stella's Lounge)(3684), GRBC Holdings, LLC, (d/b/a Grand Rapids Brewing Company)(2130), E L Brewpub, LLC (d/b/a HopCat East Lansing)(5334), HopCat-Ann Arbor, LLC (5229), HopCat-Chicago LLC (7552), HopCat-Concessions, LLC (2597), HopCat-Detroit, LLC (8519), HopCat- GR Beltline, LLC (9149), HopCat-Holland, LLC (7132), HopCat Indianapolis, LLC (d/b/a HopCat-Broad Ripple)(7970), HopCat-Kalamazoo, LLC (8992), HopCat-Kansas City, LLC (d/b/a KC, LLC and TikiCat)(6242), HopCat Lexington, LLC (6748), HopCat-Lincoln, LLC (2999), HopCat-Louisville, LLC (0252), HopCat-Madison, LLC (9108), HopCat-Minneapolis, LLC (8622), HopCat-Port St. Lucie, LLC (0616), **HopCat- Royal Oak, LLC** (1935), HopCat-St. Louis, LLC (6994), Luck of the Irish, LLC (d/b/a The Waldron Public House LLC and McFadden's Restaurant Saloon)(4255).

security interest in the Liquor License owned by HopCat – Royal Oak, LLC, one of the Debtors (the “Royal Oak Liquor License”), and that the value of the Royal Oak Liquor License is less than the debt owed to Innovo by HopCat – Royal Oak, LLC, such that the Liquor License is of no value to the Debtors. Further it is not necessary to Debtors’ reorganization as Debtors no longer operate at the former Royal Oak, Michigan location.

6. Innovo requests that the Court enter an Order approving the relief sought in the Stipulation: that the Debtors’ interest in the Royal Oak Liquor License be deemed abandoned and that Innovo be granted relief from stay to protect and transfer its interest in the Royal Oak Liquor License, including the right to proceed to effectuate a transfer of change the ownership to Innovo or its designee with the Michigan Liquor Control Commission.

WHEREFORE, Innovo Development Group, L.L.C. prays that the Court enter an Order, substantially in the form attached hereto as **Exhibit B**, deeming the Debtors’ interest in the Royal Oak Liquor License be abandoned and that Innovo Development Group, L.L.C. be granted relief from the automatic stay to protect its interest in the Royal Oak Liquor License in addition to such other relief as is just.

Respectfully submitted,

WARDROP & WARDROP, P.C.,
Attorneys for Innovo Development, LLC

Dated: July 16, 2020

By: 

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